

1 **POLSINELLI LLP**

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8 *Attorneys for Whitebox Multi-Strategy Partners, LP,*
9 *Whitebox GT Fund, LP, Pandora Select Partners, LP*
10 *and Whitebox CAJA Blanca Fund, LP*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re

15 PG&E CORPORATION;
16 PACIFIC GAS AND ELECTRIC
17 COMPANY,

18 Debtors.

Case No. 19-bk-30088 (DM)

Chapter 11

(Lead Case)
(Jointly Administered)

19 **NOTICE OF APPEARANCE AND**
20 **REQUEST FOR SPECIAL NOTICE**

21 **PLEASE TAKE NOTICE** that Tanya Behnam of Polsinelli LLP hereby appears as counsel
22 of record for Whitebox Multi-Strategy Partners, LP, Whitebox GT Fund, LP, Pandora Select
23 Partners, LP and Whitebox CAJA Blanca Fund, LP (collectively, "WHITEBOX") in the above-
24 referenced chapter 11 cases, and hereby requests that all notices given or required to be given in this
25 case to creditors, any creditors' committee, or any other party in interest (including all matters
26 described pursuant to Bankruptcy Code Section 102(1) and Bankruptcy Rules 2002(a), (b), (c), (f) and
27 (i), 3017(a), 9007 and 9010) and all papers or other documents filed, served or required to be served
28 in the above-captioned cases, be served on the addressees listed below and that, pursuant to
Bankruptcy Rules 2002 (g) and 9007, the following be added to the Court's master mailing list:

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8 **PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the
9 notices and papers referred to in the rules specified above but also includes, without limitation,
10 orders and notices of any plans, disclosure statements, applications, motions, petitions, pleadings,
11 requests, complaints, demands, whether formal or informal, whether written or oral and whether
12 transmitted or conveyed by mail delivery, facsimile, electronic transmission, or otherwise.

13 **PLEASE TAKE FURTHER NOTICE** that neither this request for notice nor any
14 subsequent appearance, pleading, proof of claim, claim or suit is intended or shall be deemed or
15 construed as:

16 (a) a consent by WHITEBOX to the jurisdiction of this Court or any other court with
17 respect to proceedings, if any, commenced in any case against or otherwise involving
18 WHITEBOX;

19 (b) a waiver of any right of WHITEBOX to (i) have an Article III judge adjudicate in the
20 first instance any case, proceeding, matter or controversy as to which a Bankruptcy Judge may
21 not enter a final order or judgment consistent with Article III of the United States Constitution,
22 (ii) have final orders in non-core matters entered only after de novo review by a District Court
23 Judge, (iii) trial by jury in any proceeding so triable in the Case or in any case, controversy, or
24 proceeding related to the Case, (iv) have the United States District Court withdraw the reference
25 in any matter subject to mandatory or discretionary withdrawal, (v) any and all rights, claims,
26 actions, defenses, setoffs, recoupments or remedies to which WHITEBOX is or may be entitled
27 under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and
28 recoupments are expressly reserved hereby, or (vi) the requirements for service of process under
Federal Rule of Bankruptcy Procedure 7004; or

1 (c) a waiver of any objections or defenses that the State of California, WHITEBOX, or
2 any other agency, unit or entity of the State of California may have to this Court's jurisdiction
3 over the State of California, WHITEBOX, or such other agency, unit or entity based upon the
4 Eleventh Amendment to the United States Constitution or related principles of sovereign
5 immunity or otherwise, all of which objections and defenses are hereby reserved.

6 This request for notice is based upon the Bankruptcy Code and the Federal Rules of
7 Bankruptcy Procedure, including Rules 2002, 3017, 9007, and 9010, but is not a consent to
8 jurisdiction of the Bankruptcy Court over WHITEBOX, and is not a waiver of WHITEBOX's
9 rights, specifically, but not limited to: (i) WHITEBOX's rights to have final orders in certain
10 matters entered only after de novo review by a district judge; (ii) WHITEBOX's rights to trial by
11 jury in any proceeding so triable herein, or in any case, controversy, or proceeding related hereto;
12 (iii) WHITEBOX's rights to have the reference withdrawn by the District Court in any matter
13 subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions,
14 defenses, setoffs, or recoupments to which WHITEBOX is or may be entitled under any agreement,
15 in law, or in equity — all of which rights, claims, actions, defenses, setoffs, and recoupments the
16 WHITEBOX expressly reserves.

17 Dated: August 24, 2021

POLSINELLI LLP

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19 By: /s/ Tanya Behnam

20 ATTORNEYS FOR Whitebox Multi-Strategy
21 Partners, LP, Whitebox GT Fund, LP, Pandora
22 Select Partners, LP and Whitebox CAJA Blanca
23 Fund, LP
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the
3 United States Bankruptcy Court for the Northern District of California by using CM/ECF system
4 on August 24, 2021. I further certify that all participants in the case are registered CM/ECF users
5 and that service will be accomplished by the CM/ECF system.

6 I certify under penalty of perjury that the foregoing is true and correct. Executed on August
7 24, 2021.

8 
9 Cindy Cripe